

# **EXHIBIT G**

**MEREDITH & KEYHANI, PLLC**

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April 28, 2017

**VIA EMAIL:** [DLaLone@fishstewip.com](mailto:DLaLone@fishstewip.com)

Douglas P. LaLone, Esq.  
Fishman Stewart PLLC  
39533 Woodward Avenue, Suite 140  
Bloomfield Hills, MI 48304


Dear Douglas:

We have carefully reviewed your letter and declaration of Masabi's employee Ben Whitaker. Bytemark also received the input of Bytemark's retained independent technical expert in this regard. You and your client's arguments of non-infringement are predicated on faulty premises. Masabi's assumptions and conclusions of non-infringement of Bytemark's asserted patent claims are predicated on Masabi's proposed claim constructions that are in dispute (which is the subject of the Court's claim construction hearing) and Masabi's "simple evaluation" that could have been done that would have proven non-infringement is flawed and does not prove that the asserted claims (as construed by one of ordinary skill in the art) are not infringed.

Bytemark firmly believes that Masabi is infringing its asserted claims as detailed in Bytemark's infringement contentions which will be elaborated on in Bytemark's expert disclosures after the completion of fact discovery.

Accordingly, I want to be very clear and put you on notice, your proposed Rule 11 motion is frivolous, and if in a lapse of judgment you should file such a motion, Bytemark will immediately move for sanctions and attorneys' fees against you, your law firm and your client. You should be aware, that a frivolously filed Rule 11 motion is subject to sanctions with no safe harbor provisions.

Sincerely,

A handwritten signature in black ink that reads "Dariush Keyhani". The signature is written in a cursive, flowing style.

Dariush Keyhani<sup>1</sup>

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<sup>1</sup> Practices exclusively in federal courts and admitted in the Southern District of New York, Eastern District of New York, Western District of New York and District of New Jersey; the Second Circuit Court of Appeals and Federal Circuit Court of Appeals; member of the District of Columbia Bar and New Jersey State Bar. Not a member of the New York State Bar.